

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JENNIFER ECKHART and CATHY AREU, :

Plaintiffs, :

against :

FOX NEWS NETWORK, LLC, ED HENRY, :
SEAN HANNITY, TUCKER CARLSON and :
HOWARD KURTZ, in their individual and :
professional capacities, :

Defendants. :

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Civil Case No. 1:20-cv-05593

**AFFIDAVIT OF CHELSEA GILMAN IN SUPPORT OF
DEFENDANTS' RULE 11 MOTION FOR SANCTIONS**

I, Chelsea Gilman, affirm the following to be true under penalty of perjury pursuant to 28 U.S.C. § 1746 and Local Civil Rule 1.9:

1. I have been employed with Fox News Network, LLC ("Fox News") since December 2016. I am currently a Booker for *Tucker Carlson Tonight*, a Fox News Channel program that airs on Monday to Friday from 8 p.m. to 9 p.m. Eastern Time. I have worked in this role since April 2018. I am fully familiar with the facts and circumstances set forth herein and make this Affidavit in Support of Defendants' Rule 11 Motion for Sanctions.
2. I have reviewed all of the transcripts for episodes of *Tucker Carlson Tonight* for the period from December 1, 2018 through September 30, 2019. The transcripts reflect

that Plaintiff Cathy Areu appeared as a guest on *Tucker Carlson Tonight* on the following dates during that time period:

- December 28, 2018
- March 1, 2019
- May 24, 2019
- August 20, 2019
- September 6, 2019

3. There were also at least three additional occasions after November 30, 2018 where I attempted to book Ms. Areu as a guest on the show, but she was unable to appear due to her unavailability, the redundancy of her views, or breaking news.

Dated: 8/28/20

By: Chelsea Gilman
Chelsea Gilman